



**Tompkins, McGuire, Wachenfeld & Barry LLP**

**Attorneys at Law**

**Grant W. McGuire | Partner**  
**Reply to: 3 Becker Farm Road Suite 402**  
**Roseland, New Jersey 07068-1726**  
**T: 973.623.7495 | F: 973.623.7780**  
**gm McGuire@tompkinsmcguire.com**

**Gateway One Center**  
**Suite 615**  
**Newark, N. J. 07102**  
**T: 973.622.3000**

January 5, 2017

**Via ECF**

The Honorable Katharine S. Hayden  
United States District Judge  
Frank R. Lautenberg U.S. Post Office & Courthouse  
Courtroom PO 05  
1 Federal Square  
Newark, NJ 07101

**Re: NXIVM Corporation, et. al. v. The Ross Institute, et. al.**  
**[NXIVM v. Franco Bifurcated Trial]**  
**Civil Action No.: 06-cv-1051 (KSH/CLW)**  
**Our File No.: 4472-1**

Dear Judge Hayden:

The attached declaration and notice is submitted at the request of the author of same,  
Robert D. Crockett, Esq.

Respectfully submitted,

/s/ Grant W. McGuire  
Grant W. McGuire  
For TOMPKINS, MCGUIRE, WACHENFELD & BARRY, LLP

GWM

cc: Anthony Sylvester, Esq.  
(Via ECF and e-mail)